

Consultation on MCS equivalence for the Domestic Renewable Heat Incentive Scheme

Consultation

Publication date: 20/03/2015

Response deadline: 29/05/2015

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Overview:

The purpose of this consultation is to obtain information and views to help develop a set of criteria and assessment processes that Ofgem, the administrator of the Domestic Renewable Heat Incentive (RHI), can use when assessing Domestic RHI heating system eligibility to establish whether a certification scheme is equivalent to the Microgeneration Certification Scheme (MCS). We are limiting our focus to criteria related to the renewable heat technologies (i.e. biomass, solar thermal, air and ground source heat pumps) allowed under The Domestic Renewable Heat Incentive Regulations (2014) (as amended) and the installation services required to install and commission these in domestic properties.

The details of the criteria and assessment processes will be drafted in light of the responses to this consultation, and of inputs from Government, Industry and other stakeholders. These detailed criteria and processes will be consulted upon in a follow up consultation.

A good customer journey is an important part of our administration of the Domestic RHI. Therefore we intend to keep our administrative processes for assessing Domestic RHI eligibility as uniform as possible for applicants, irrespective of the certification scheme they use to support their application. We ask that you keep this in mind in your responses to this consultation.

This consultation does not cover any of the requirements relating to a certification scheme seeking United Kingdom Accreditation Service (UKAS) accreditation. This is a legislative requirement for certification schemes and would be a prerequisite for any scheme approaching us for determination of MCS equivalence. Further information on this can be found using the link in the Associated Documents section.

Context

It's the UK's goal to reduce carbon emissions across the economy by 80% by 2050. Heating accounts for around 47% of total UK energy demand, however, almost all of the energy we currently use for heating our homes and hot water comes from burning fossil fuels, with only a small number of households using renewable, low-carbon sources of energy for heating. With this in mind, the Department of Energy and Climate Change (DECC) created the Domestic RHI, a financial incentive scheme to encourage the uptake of renewable heating, that launched on 9 April 2014.

The Domestic RHI is open to homeowners, which includes owner occupiers, tenants (where they own the heating system), landlords and social landlords that have installed and commissioned an eligible renewable heating system in an eligible property.

Ofgem as the scheme administrator has a duty to assess information provided by an applicant to the Domestic RHI, accredit to the scheme eligible heating systems, issue payments to scheme participants and monitor participant compliance with the requirements of the Regulations.

As part of the application process, Ofgem relies on information provided to applicants by MCS as evidence of Regulatory compliance and to calculate solar thermal payments. Ofgem also validates the information provided by the applicant with information contained on the MCS database.

The Domestic RHI Regulations specifically refer to MCS or "equivalent", therefore as scheme administrator we need to be able to recognise when a certification scheme is equivalent to MCS, and, if an applicant makes an application using supporting evidence from an alternative (non-MCS) certification scheme we must be confident that the information provided has the same level of detail and assurance as MCS ensuring that the requirements of the legislation have been met.

So far, all applications to the Domestic RHI have been made using supporting evidence provided by MCS and no equivalent scheme has been identified. But, we have been approached by interested stakeholders about what seeking recognition as an equivalent scheme might entail.

For these reasons in this consultation we are asking for initial views on the development of a set of working criteria for determining MCS equivalence, and the processes that Ofgem might use to assess them.

Associated Documents

The full Domestic RHI scheme requirements are set out in the regulations:

Domestic Renewable Heat Incentive Scheme Regulations (2014):

<http://www.legislation.gov.uk/ukxi/2014/928/made>

The Domestic Renewable Heat Incentive Scheme (Amendment) Regulations (2015):

<http://www.legislation.gov.uk/ukxi/2015/143/contents/made>

The guidance material published by Ofgem on our website provides an excellent insight into the application process and the information we require to be provided by applicants.

Ofgem DRHI website:

<https://www.ofgem.gov.uk/environmental-programmes/domestic-renewable-heat-incentive>

Ofgem DRHI guidance:

<https://www.ofgem.gov.uk/environmental-programmes/domestic-renewable-heat-incentive/about-domestic-rhi/guides-and-videos-domestic-renewable-heat-incentive>

Other reading material is outlined below. This is not an exhaustive list but will help provide a good understanding of the key stakeholders and their respective roles and responsibilities in connection with the Domestic RHI.

Department of Energy and Climate Change's (DECC) website:

<https://www.gov.uk/government/policies/increasing-the-use-of-low-carbon-technologies/supporting-pages/renewable-heat-incentive-rhi>

Department of Energy and Climate Change's (DECC) RHI Policy Document:

<https://www.gov.uk/government/consultations/renewable-heat-incentive-proposals-for-a-domestic-scheme>

MCS website:

<http://www.microgenerationcertification.org>

MCS Standards:

<http://www.microgenerationcertification.org/mcs-standards/mcs-standards>

UKAS 'Applying for Accreditation' web page:

http://ukas.com/about-accreditation/apply-for-accreditation/Apply_for_Accreditation.asp

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1. Executive Summary

The Domestic RHI is a government financial incentive designed to transform the domestic renewable heat market. It's intended to help the UK meet its 2020 renewable energy targets, reduce carbon emissions and is for households both off and on the gas grid.

Since its launch on 9 April 2014, over 25,000 successful applications have been received and the number of new applications is increasing each month.

The Domestic Renewable Heat Incentive Regulations require that an applicant's renewable heating system is installed by an MCS (or equivalent) installer in line with the appropriate MCS standard set out in the regulations (or an equivalent standard). Because of this, Ofgem has to have the ability to assess and recognise an equivalent scheme.


Why do we need this consultation?

We're considering how to develop a set of criteria and assessment processes that Ofgem as the administrator of the Domestic RHI could use to identify whether a scheme is equivalent to the Microgeneration Certification Scheme (MCS) when assessing Domestic RHI heating system eligibility. A scheme seeking recognition of MCS equivalence by the Domestic RHI would need to provide both product and installer certification for a minimum of one renewable heat technology (when we discuss the "products" covered by MCS in this consultation we are referring to both material technologies and installation services). Although we expect a recognised scheme to be equivalent to MCS, this does not mean we expect it to be exactly the same.

Given the importance of identifying a set of working criteria for determining scheme equivalence, we are proceeding with a two-stage consultation process, Part 1 and Part 2. Part 1, this consultation, asks for responses on what are felt to be the key elements of scheme equivalence, while Part 2 will consolidate our view of equivalence and set out in detail how we intend to assess a scheme seeking recognition.

At this stage we are not proposing the full set of criteria. However we have identified an initial list of what we feel to be the minimum requirements that would need to be included, to help prompt stakeholder feedback. In the main document we set out a list of criteria, too numerous to list here, grouped into the following categories:

- **Key prerequisites** – there are certain criteria that, while they don't themselves contribute to the question of equivalence, all certification schemes must meet.
- **Scheme values** – the key values we propose an equivalent scheme should aspire to.
- **Scheme objectives** – the objectives of MCS that we feel a scheme claiming to be equivalent would need to demonstrate.



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- **Scheme features** – for the purposes of determining MCS equivalence, a comparison will be required of an equivalent scheme’s features – such as governance, rules, conditions, installation standards, certification and registration of installations, processes and procedures, compliance and enforcement approaches – against the features of MCS in force at the relevant time.
- **Requirements and outcomes** – an equivalent scheme must be able to produce similar outcomes.

We also seek stakeholder input into the development of processes and procedures for recognising MCS equivalence with a focus on:

- **Scheme comparison** – the methods we could use to assess a scheme to see if it meets an equivalence ‘test’, what that ‘test’ might consist of and how it might be carried out.
- **Seeking recognition** – how a scheme would go about seeking recognition of equivalence with MCS.
- **Assessment processes** – the initial and ongoing assessment of a scheme claiming to be equivalent to MCS.
- **Maintaining recognition** – how a scheme would maintain recognition of equivalence when changes to existing MCS standards, processes and procedures occur.

Who should respond?

In response to this consultation we hope to hear from anyone with an interest in the introduction of schemes equivalent to MCS for the purpose of Domestic RHI eligibility.

Not all aspects of this consultation will be relevant to all organisations. We encourage as many people and organisations as possible to respond. A full list of all the questions in the consultation is set out in Appendix 3.

Respondents are welcome to answer all questions but equally we welcome partial responses if you feel your information or views relate only to some of our questions, we encourage you to respond to as many or as few of these questions as you wish.

2. Background

About the Domestic Renewable Heat Incentive (RHI) Scheme

What is it and who is it for?

- 2.1. The Domestic RHI is a government financial incentive launched on 9 April 2014 by DECC to promote the use of renewable heat. It's the UK's goal to reduce carbon emissions across the economy by 80% by 2050. As heating accounts for around 47% of total UK energy demand, switching to heating systems that use naturally replenished energy can help the UK meet these targets.
- 2.2. The Domestic RHI is open to anyone who can meet the eligibility requirements. This includes homeowners (owner occupiers and tenants where they own the heating system), landlords and social landlords that have installed and commissioned an eligible renewable heating system in an eligible property.
- 2.3. People who join the Domestic RHI scheme and comply with its rules receive quarterly payments for seven years for the amount of renewable heat their homes require.

What is Ofgem's role in the Domestic RHI scheme?

- 2.4. Ofgem is the Domestic RHI scheme administrator and therefore has a duty to administer the scheme in accordance with the Domestic Renewable Heat Incentive Scheme Regulations.
- 2.5. As administrator of the scheme Ofgem must:
 - a) receive, assess, and where eligible, accredit applications to the Domestic RHI scheme
 - b) verify that the participants are meeting their scheme obligations
 - c) calculate and make payments to Domestic RHI scheme participants
 - d) calculate and publish tariffs
 - e) maintain a central register of applicant and participant information
 - f) publish guidance
 - g) report to the Secretary of State.

What is the role of MCS in the Domestic RHI?


- 2.6. The Domestic RHI regulations have specific installation certification requirements stating that the installation of a plant must be MCS certified or certified by an equivalent scheme.

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- 2.7. This is a minimum requirement – all plants must be MCS certified (or equivalent) to be capable of being accredited under the Domestic RHI scheme. However, MCS certification alone is no guarantee of accreditation since there are a significant number of other eligibility criteria.
- 2.8. Additionally, as part of the application and verification process, Ofgem relies on information provided to applicants by MCS, or an equivalent scheme, as evidence of Regulatory compliance and to calculate solar thermal payments.
- 2.9. Ofgem also validates the information provided by the applicant with information contained on databases held on the MCS register.
- 2.10. The Microgeneration Certification Scheme (MCS) is an independent, industry-led certification scheme accredited by the United Kingdom Accreditation Service (UKAS). It provides an internationally recognised quality assurance scheme that certifies microgeneration technologies used to produce electricity and heat from renewable sources.
- 2.11. MCS certification bodies assess microgeneration products (renewable heating technologies and installation services) and installation companies against consistent, robust standards. By providing assurances as to the quality, durability and energy generation performance of microgeneration products, and warranties to consumers on the quality of their microgeneration installations, MCS aims to protect consumers in this emerging market.
- 2.12. Members of MCS are also expected to comply with the standards set out by the Renewable Energy Association's (REA) Renewable Energy Consumer Code (RECC) which is currently the only scheme recognised by MCS that is backed by the Trading Standards Institute (formerly a role performed by the Office of Fair Trading) for the microgeneration sector.
- 2.13. Under The Domestic Renewable Heat Incentive Scheme Regulations Ofgem relies on MCS, or an equivalent scheme, to provide evidence that a Domestic RHI applicant's renewable heating system has been installed to a standard that allows it to meet the scheme rules, namely:
 - a) by a certified installer
 - b) to an appropriate standard
 - c) using an eligible product (renewable heating technologies and installation services)
 - d) recorded on a central register of installation information.

What is the concept of MCS equivalence in the Domestic RHI?

- 2.14. The Domestic RHI regulations specifically refer to "*the Microgeneration Certification Scheme, or an equivalent scheme*", therefore as scheme



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administrator we need to be able to recognise when a certification scheme is “equivalent” to MCS, in the context of the Domestic RHI.

- 2.15. We must also be confident that if an applicant makes an application to the Domestic RHI using supporting evidence from an equivalent certification scheme that the information provided has the same level of detail and assurance as MCS ensuring that the requirements of the legislation have been met.
- 2.16. Therefore we believe that a fundamental requirement of an MCS equivalent scheme will be for good quality installers to deliver good quality installations using good quality products. Meeting the needs of the consumer as well as the Domestic RHI scheme requirements should the consumer wish to apply to Ofgem.
- 2.17. Whilst the concept of MCS equivalence is included in the Domestic RHI Regulations (references in Appendix 2), detailed criteria for assessing what constitutes an equivalent scheme, and how these would be assessed, are not.
- 2.18. So far, all applications to the Domestic RHI have had MCS certified installations and been made using supporting evidence provided by MCS. No equivalent scheme has been identified but, as we have been approached by interested stakeholders about what seeking recognition as an equivalent scheme might entail, we are undertaking this consultation.
- 2.19. We are seeking views on what the key criteria for scheme equivalence should be and how they may be assessed by Ofgem when exercising our discretion in administering the Domestic RHI scheme.
- 2.20. Given the significance of MCS, we have decided to proceed with a two-stage consultation process on MCS equivalence. We wish to work with stakeholders to decide the criteria for a scheme that claims to be equivalent to MCS and ways to carry out an assessment of that scheme against the chosen criteria.

3. The Consultation Process

Consultation Drivers

Ofgem and the Department of Energy and Climate Change (DECC) have been asked by interested stakeholders to establish the criteria for an equivalent scheme.

This question, coupled with our desire to make the Domestic RHI scheme as open and transparent as possible, are the main drivers behind our decision to consult on this.

Consultation Details

- 3.1. As stated in the consultation overview, we intend to keep our administrative processes for assessing Domestic RHI heating system eligibility as uniform as possible for applicants, irrespective of the certification scheme they use to support their application. We would ask that this be kept in mind when responding to this consultation.
- 3.2. Given the importance of identifying a set of working criteria for determining scheme equivalence that are both fair and reasonable, we have chosen to proceed with a two-stage consultation process, Part 1 and Part 2.
- 3.3. Part 1 (this part of the consultation) asks for responses on what are felt to be the key principles of scheme equivalence and also for any ideas you may have on how we should assess against the criteria.
- 3.4. Part 2 will state what we propose with regards to criteria and assessment processes and how these should be addressed based on responses to Part 1 and our understanding of the Regulations.
- 3.5. In this consultation we seek views on the fundamental features that an equivalent scheme needs to have. As a starting point we have outlined some key areas that we believe an equivalent scheme will need to develop and share with us to demonstrate equivalence.
- 3.6. We have outlined a few areas in Sections 3 and 4 to help prompt responses on ideas we have, but these should not be considered as an exhaustive list.
- 3.7. We're also asking for views on how Ofgem might undertake an assessment of an equivalent scheme. Again, some initial thoughts by Ofgem can be found in Section 5 and we welcome views on the practical steps you think we should undertake.



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- 3.8. This consultation will close at 5pm on 29 May 2015; see Appendix 3 for more details.
- 3.9. In summer 2015 we plan to publish an interim report that will take into account responses to this consultation. Following this, in autumn 2015, we will publish Part 2 of the consultation based on responses to Part 1, along with other inputs, seeking final views on the criteria and assessment processes proposed.
- 3.10. It will be necessary to allow all stakeholders time to provide their views, and for those views to be fully considered, before drafting and publishing a full set of criteria to determine MCS equivalence later this year.

Consultation Questions

Q3.1.	Do you have any comments relating to the consultation process we have selected? Please provide an explanation, including any supporting information, with your response.
Q3.2.	Do you have any comments on the timescales outlined?

4. Guiding Principles

Key Principles

We believe that it will be important for people responding to this consultation to have a view of the key principles behind our approach to determining scheme equivalence, the boundaries and limitations of equivalence and an introduction to those areas where comparisons will be required.

Chapter 5 will seek to characterise these in more detail.

Our Approach

- 4.1. Due to the complexity of determining MCS equivalence for the purpose of the Domestic RHI, and the significance of MCS in the context of the microgeneration industry, in this part of the consultation, we are not proposing a full set of criteria. Rather, we have identified an initial list of what we feel to be the equivalence requirements that need to be included and are seeking views from interested parties on what the full list of MCS equivalence criteria and assessment processes should be.
- 4.2. Although we expect a recognised scheme to be equivalent to MCS, this does not mean we expect it to be exactly the same.
- 4.3. Therefore our approach to identifying certification scheme equivalence to MCS is to begin by analysing the key features of MCS that we would expect to see when making a determination on equivalence.
- 4.4. We have identified five areas that we believe we would need to review when considering equivalence:
 - a) **Prerequisites** – there are certain criteria that, while they don't themselves contribute to the question of equivalence, all certification schemes must meet. For example achieving UKAS accreditation and fulfilling their legal responsibilities.
 - b) **Scheme values** – the key values we propose an equivalent scheme should aspire to.
 - c) **Scheme objectives** – the objectives of MCS that we feel a scheme claiming to be equivalent would need to demonstrate.
 - d) **Scheme features** – for the purposes of determining MCS equivalence, a comparison will be required of an equivalent scheme's governance, rules,

conditions, installation standards, certification and registration of installations, compliance and enforcement, processes and procedures against the requirements of MCS in force at the relevant time. There is the ongoing possibility of MCS changing over time so Ofgem's recognition of MCS equivalence would be reviewed on the basis of any changes made to MCS. Therefore we would expect that a scheme would have processes in place to ensure they maintain equivalence with the updated MCS if they wanted to maintain recognition by Ofgem as an equivalent scheme.

- e) **Scheme specific requirements and outcomes:** An equivalent scheme must be able to produce similar outcomes, but we do not intend to suggest requirements that MCS does not have.

4.5. To help stimulate thought processes and to encourage detailed responses we have included a number of more detailed suggestions for equivalence criteria in Chapter 5.

Consultation Questions

Q4.1.	Do you agree with these principles? Please provide an explanation including any supporting information with your response.
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Q4.2	Do you have any comments on the principles outlined in this section, such as suggestions to make them more appropriate?
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Q4.3	Are there any areas not mentioned that you feel should be covered? Please provide an explanation including any supporting information with your response.
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5. Initial Proposals

The key features of an equivalent certification scheme

Defined criteria, and the ability to assess a scheme claiming equivalence, are at the core of this consultation. However, we believe understanding the values of MCS, its objectives and key features will help people to not only see the tangible criteria better but also the sentiment behind the requirements for a quality certification scheme.

Below we have laid out what we believe are the minimum features that we would expect to see when making a determination on certification scheme equivalence.

In this consultation we are not seeking comments on MCS itself. These values, objectives and features are only provided to help focus responses to this consultation.

Prerequisites

- 5.1. There are certain requirements that all certification schemes must meet such as achieving UKAS accreditation and fulfilling their legal responsibility.
 - a) In order to meet the Domestic RHI regulation's definitions for a "certified installer", "MCS register" and to comply with the regulation's certification requirements, the scheme should first be accredited against BS EN 45011:1998 or EN ISO/IEC 17065:2012. This would need to be achieved through accreditation by the UK Accreditation Service (UKAS); or an equivalent national body affiliated to the European co-operation for Accreditation (EA) and which is a signatory to the EA Multilateral Agreement (EA MLA) or the International Laboratory Accreditation Cooperation (ILAC) and is a signatory to the ILAC Mutual Recognition Arrangement (often referred to as the ILAC Arrangement). Accreditation to either standard would meet the requirements of the Domestic RHI Regulations. We note, however, that UKAS advise on their website that they require successful transition from BS EN 45011:1998 to ISO/IEC 17065:2012 by 1 September 2015. Therefore any equivalent scheme would need to be accredited against EN ISO/IEC 17065:2012 by that date to maintain UKAS accreditation.
 - b) It, and any associated Conformity Assessment Bodies (sometimes called Certification Bodies), should continue to operate within the requirements of its accreditation, be it EN 45011 or EN ISO/IEC 17065:2102 and any other standards that may apply to MCS.
 - c) It should comply with its legal responsibilities under relevant European Union (EU) and UK single market and competition legislation such as notification requirements to the EU Technical Standards and Regulations Directive 98/34/EC.

- 5.2. Once the prerequisites have been achieved, an application for recognition as an equivalent scheme may then be considered by Ofgem.

Scheme Values

- 5.3. To help Ofgem determine if another scheme can be recognised as equivalent to MCS we believe it important to understand the key values we propose an equivalent scheme should demonstrate through the features of the scheme.
- a) The scheme should include consumer protection and have the aim of improving industry standards.
 - b) It should facilitate and promote within the United Kingdom quality improvements in relation to the manufacture and installation of small scale, onsite renewable generation technologies.
 - c) It should operate in a manner that does not create undue barriers to trade in the EU single market and internationally.

Scheme Objectives

- 5.4. In order to support comments on our approach we provide an insight into the objectives of MCS that we feel a scheme claiming to be equivalent would need to demonstrate.
- a) It should develop written materials to support the understanding and knowledge of the scheme and how it operates.
 - b) It should provide appropriate audit and verification requirements to ensure the scheme is functioning within its requirements.
 - c) It should provide compliance reviews and a complaints process in support of the scheme's Conformity Assessment Bodies' codes of conduct and alternate dispute resolution requirements.
 - d) It should provide liability protection for those involved in the development of the scheme and the standards that form part of it. Currently MCS has a figure of £10 million and we would look for an amount in line with this.
 - e) It should provide clear requirements for competence that supports the development and upskilling of the installer organisations in meeting scheme and regulatory requirements.

High Level Scheme Features

5.5. Whilst the scheme values and objectives are themselves somewhat intangible and difficult to assess, we believe that a scheme seeking recognition as equivalent to MCS and wanting to maintain that recognition would need to have features, such as those listed below, as they underpin the values and objectives above and we feel are the foundation of a good quality certification scheme.

a) **Scheme governance**

- i. An equivalent scheme does not need to have the same governance structure as MCS but it would need to demonstrate robust governance processes and follow commonly accepted principles of good governance. The key underlying principles of its governance processes would need to be equivalent to those employed by MCS. For example it would need to be able to demonstrate independence and impartiality.
- ii. From time to time, the scheme should review its functions and governance.
- iii. It should have a governance structure that ensures that certification marks and brands are respected so their use provides confidence and trust in the uptake of microgeneration renewable technologies.

b) **Scheme operation**

- i. It should employ formalised and published technical standards and administrative processes equivalent to those employed by MCS and carry out analysis and review of the scheme's operations, from time to time, to ensure they remain equivalent to MCS in the areas relevant to the renewable heat technologies and installation standards mentioned in this consultation.
- ii. It should hold and maintain a register of certified products and installers and such details about each installed product such that information required can be provide to Ofgem when their customers apply to the Domestic RHI scheme.
- iii. It should provide an installation certificate using data held on the scheme's register relevant to that installation that records data including site details, installer details, product details and installation details equivalent to MCS and keep these in the scheme's register.
- iv. It should have a set of managed and maintained scheme requirements that product manufacturers and installation companies are required to adhere to and offer remedies should non-conformities occur.

- v. It should maintain a compliance programme so that it can evidence that the installed systems, and the scheme's certified installation companies and products, have met relevant minimum requirements.
- vi. The compliance programme should be supported by appropriate and robust enforcement processes and have sufficient sanctions available to deter or deal with any occurrences of non-compliance.
- vii. It should be able to interact with Ofgem to enable data access and information sharing for the accreditation of applicants to the Domestic RHI scheme as required.

c) Product workmanship and quality

- i. It should develop and maintain product standards for at least one of the renewable heat technologies currently within the scope of MCS.
- ii. It should be able to certify products and verify the capabilities of these against the scheme's standards (which are equivalent to MCS standards) in a manner equivalent to MCS.
- iii. To note that – in addition the requirement for the installation of a plant to be certified by MCS (or equivalent), the Domestic RHI Regulations specify particular product standards which plants need to meet. This would also apply to applications in relation to plants certified by an equivalent scheme.

d) Installer workmanship and competency

- i. It should develop and maintain installer standards for the renewable heat technologies currently within the scope of MCS.
- ii. It should include the certification of installation companies and verify the capabilities of these against the scheme's standards in a manner equivalent to MCS.

5.6. Other areas that we believe a scheme equivalent to MCS would need to address, and that we will be looking for comments and ideas on are:

- a) **Fees**
- b) **Warranties**
- c) **Structure**
 - i. operational management
 - ii. standards management
 - iii. technical working groups.

5.7. The ideas above should not be considered an exhaustive list of features. Therefore we seek responses to our consultation on what you feel should constitute the key features.

Equivalent scheme specific requirements and outcomes

- 5.8. A scheme seeking to be recognised as equivalent to MCS will need to consider a number of deliverables that are accessible to the public and to Ofgem.
- 5.9. **Standards** – One area we particularly want to hear responses on are the equivalent scheme standards for products (renewable heating technologies and installation services as defined in EN45011) and installers relative to one of more of the four renewable heat technologies covered by the Domestic RHI scheme and how they should equate to MCS product and installer certification and standards. These include:
- a) **One or more of the following MCS product and installer certification and standards**
 - i. biomass boilers and stoves – (MCS 008 and MIS 3004)
 - ii. air source heat pumps – (MCS 007 and MIS 3005)
 - iii. ground source heat pumps – (MCS 007, MIS 3005 and MCS 022)
 - iv. solar thermal – (MCS 004 and MIS 3001)
 - b) **Other relevant scheme standards and guidance needing views and comment are a consistent methodology to determine:**
 - i. the estimated annual heat generated by any plant generating heat using a solar collector
 - ii. whether the plant generating heat needs to be metered
 - iii. the Seasonal Performance Factor (SPF) for any plant generating heat using a heat pump.
 - c) **Correct design and sizing** for solar thermal systems (equivalent to MCS 024) and a heat emitter guide for heat pumps (equivalent to MCS 021) are important and will need to produce outcomes identical to MCS as these are specifically cited in the Domestic RHI Regulations, without reference to equivalence, and can affect Domestic RHI payments to applicants.
 - d) **An overarching set of standards** that exist in MCS which an equivalent scheme would need to address are those that cover installer certification (MCS 001), competency criteria for installers (MCS 025), 'permitted development' planning standards (MCS 020) and guidance documents covering metering and installation and sizing within the 45kW limits of microgeneration heat technologies as defined by the Energy Act (2004). All these exist today in MCS and we believe an equivalent scheme would need similar documentation.

5.10. **Scheme register** – One area, as defined within the Domestic RHI regulations, relates to the register of installers and plant which are certified under that scheme. We want to hear responses on how an equivalent scheme should record this data, in particular:

- a) provision for the keeping of a register of all installers certified by the scheme under a unique reference number and identification publically of the type of plant that the installer’s certification covers
- b) provision for the keeping of a register of each plant type or model which is certified under the scheme under a unique reference number and accessibility of that register to the public
- c) provision of access to any information on the scheme’s register which may be relevant to the operation or running of the Domestic RHI.

5.11. **Production of installation certificates** (for one of more of the four renewable heat technologies covered by the Domestic RHI scheme) – An installation certificate should only be issued in respect of a plant that complies with all recognised standards that apply to that plant, and where the installer has been certified for the specific type of plant installed at the property for which the certificate is being issued. If the scheme’s installation certificate does not include all the information necessary to demonstrate compliance with all relevant standards then a separate Compliance Certificate should provide the necessary evidence of compliance. In order to be recognised an equivalent scheme should:

- a) have the ability to provide an installation certificate, with a unique reference number, that records data including site, installer, product and installation details, date of commissioning and date the certificate was generated
- b) issue a certificate in respect of each plant installed which meets the requirements
- c) issue on the same certificate, or via a separate certificate, evidence of compliance with relevant installation standards
- d) identify on the certificate whether the plant generates heat by using:
 - i. biomass
 - ii. ground (water) source heat pump
 - iii. air source heat pump
 - iv. solar thermal.
- e) identify on the certificate, in relation to any plant which generates heat using a solar collector, the estimated annual heat generated by the plant determined under the methodology used by the recognised scheme

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- f) identify on the certificate, in relation to any plant which is a heat pump, the Seasonal Performance Factor (SPF) for that plant installed as determined under the methodology used by the recognised scheme that is equivalent to the MCS Heat Emitter Guide
- g) provide a copy of the certificate to the domestic property owner in which the plant was installed and copies of all certificates issued should be retained by the scheme for examination as required
- h) issue a compliance certificate confirming all relevant standards have been met and detailing information about the certified plant installed that can be used to verify compliance with relevant standards.

5.12. **Consumer Codes of Conduct** – The scheme should require that its members comply with a Code of Conduct that it publishes and to sign up to a relevant consumer code approved by the Trading Standards Institute.

5.13. **Professional Indemnity** – It should require installers to have appropriate indemnity arrangements in place directly, or via the consumer code, on behalf of its members activities and for the benefit of their customers covering:

- a) sales activities;
- b) contractual activities;
- c) technical (design, installation, commissioning) activities; and
- d) equipment performance against installation design specification.

5.14. In addition to the list of criteria for an equivalent scheme we need to determine how an assessment of an equivalent scheme should be undertaken by Ofgem. This is covered in more detail in Section 6.

Consultation Questions

Q5.1.	Do you agree with our proposals on MCS equivalence criteria? Please provide an explanation including any supporting information with your response.
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Q5.2	What additional criteria, if any, do you suggest should be considered? Please provide an explanation including any supporting information with your response.
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6. Scheme Criteria Assessment

Assessment Process


As well as determining a set of criteria for MCS equivalence it will be necessary to have a method of assessing them to be sure that a scheme is truly equivalent.

Carrying out a comparison of a scheme claiming equivalence to MCS will require a complex set of assessments of scheme standards, operational, structural and functional activities in many areas.

To encourage responses and ideas on assessing MCS equivalence criteria we have provided an insight into the Domestic RHI scheme's key processes, their interactions involving applicant information and MCS, and the data MCS holds that we rely on during the application process and thereafter. This is provided for information only but we hope a greater understanding in this area will help prompt suggestions for methods to assess equivalence criteria appropriately and ideas on how this could be achieved in practice.

Scheme Comparison

- 6.1. As outlined in the previous chapter, requirement for a scheme to be equivalent operates on a number of levels. However, the methods and processes for Ofgem to assess those criteria are yet to be determined. This chapter looks for views on the methods we could use to assess a scheme to see if it meets an equivalence 'test', what that 'test' might consist of and how it might be carried out.
- 6.2. **Our Processes** – Ofgem checks the validity of applicant declarations in the process of assessing applications against information held by MCS and other agencies at a number of stages. We hope a greater understanding of our process will prompt suggestions for appropriate assessment of equivalent criteria and how this could be achieved.
 - a) At the application stage Ofgem employs a series of measures within its IT system to access information contained in the MCS Installation Database (MID) to verify applicant eligibility. Our IT system in effect interrogates the data held by MCS for conformity with that provided by the applicant. This is necessary to help Ofgem validate applicant eligibility.
 - b) The information that we access in the MID is that logged by the installer when registering the installation, generating an MCS Certificate and completing a Compliance Certificate. Any discrepancy between the MID and the applicant declared data immediately triggers an alarm that prompts further investigation.



Consultation on MCS equivalence for the Domestic Renewable Heat Incentive Scheme

- c) A recognised scheme will need to be able to provide access to equivalent information held on their register of installations to support Ofgem in the performance of its duties as Domestic RHI scheme administrator when we process applications. The method that this information is supplied to Ofgem would not have to be the same as that used by MCS.
- d) Post application, Ofgem undertakes a percentage of desk and site based audits to check information declared by the applicant and verify data pertaining to the installation as recorded on the MID, the MCS Certificate and Compliance Certificate.
- e) In order for us to be satisfied that eligibility criteria have been met, a recognised scheme will need to be able to provide equivalent information to support Ofgem in the performance of its audit duties as Domestic RHI scheme administrator.
- f) Ofgem has also built a list of eligible products called the Product Eligibility List (PEL). This is based on information passed to us on a weekly basis by MCS who hold a list of all certified products. An equivalent scheme would need to share with us the detailed data for the products they have certified as part of our assessment process and make it available on an ongoing basis to support operational procedures.
- g) MCS holds a list of certified installers that we're able to view online to verify the status of the installer at any given time when checking certification eligibility. A recognised scheme would need to hold a register of certified installers so that we can check this as part of the assessment process and make it available on an ongoing basis to support operational procedures
- h) MCS holds a register of all certified installations that we use extensively as part of the application accreditation process. A recognised scheme would need to hold a register of certified installations, and would need to make this available to Ofgem as part of the assessment process and make it available on an ongoing basis to support operational procedures

6.3. **Special Considerations** – As outlined in Chapter 5 special attention to these areas will be needed to achieve a detailed understanding of how a recognised scheme will ensure that the methodologies used in these areas will achieve the same outcomes as MCS.

- a) calculating the estimated annual heat which is generated by a solar thermal plant or the SPF of a heat pump as these have a material impact on the payments made to applicants

- b) relevant scheme standards and guidance should support the correct design and sizing for solar thermal systems (equivalent to MCS 024) and a heat emitter guide for heat pumps (equivalent to MCS 021)
- c) identification of whether metering for the Domestic RHI is required.

Seeking Recognition

6.4. In order to make the customer journey of a Domestic RHI applicant using an alternate scheme as smooth as possible an equivalent scheme would need to make a request for recognition in advance of any applications being made to us. A request to recognise a scheme as equivalent would need to be made in writing and submitted to Ofgem only after UKAS accreditation has been successfully achieved.

- a) Any person may ask for recognition of a scheme subject to conditions outlined in 6.4 c) being met.
- b) Any person may apply for recognition of a new standard maintained by a recognised scheme, or approval of changes to a recognised standard, subject to conditions outlined in 6.4 c) being met.
- c) All requests for recognition by Ofgem should be supported by:
 - i. evidence that the individual has authority to seek recognition on behalf of the scheme
 - ii. a copy of the standards for which recognition is sought
 - iii. any information which Ofgem deem necessary in order to be able to determine whether the standards meet the requirements for equivalence
 - iv. such other information as the Ofgem may require to enable it to consider the request for recognition
 - v. a declaration that the information provided by the person seeking recognition is accurate to the best of that person's knowledge and belief.

Undertaking Assessments

6.5. It will be necessary to conduct an initial assessment of a scheme claiming to be equivalent to MCS, but it will also be necessary that Ofgem and the scheme continue to work together to audit and verify compliance with the standards the scheme operates. This could be handled in a number of ways, such as observer status for Ofgem on the scheme's main governance committees, or other ways that the recognised scheme may wish to suggest.

6.6. Your detailed ideas on assessment of the product and installation standards set by an equivalent scheme are of particular interest as this requires an adequate

Consultation on MCS equivalence for the Domestic Renewable Heat Incentive Scheme

understanding of relevant technical design capabilities, installation skills and product knowledge, combined with a good understanding of health & safety requirements.

- 6.7. How we should undertake assessments is an area on which we welcome your thoughts and ideas. Please suggest suitable methods that could be employed and organisations you believe we would need to work with in order to complete this task.

Maintaining recognition of equivalence

- 6.8. Ofgem would need to re-assess the equivalent scheme as and when changes to existing MCS standards, processes and procedures occur. The equivalent scheme would, in a reasonable timeframe, need to demonstrate how they would come back into line with MCS and what those timeframes would be. It's envisaged that this would need to happen in time to align with changes to the Domestic RHI Regulations if the scheme wishes to continue to be recognised by Ofgem as equivalent to MCS.

Consultation Questions

Q6.1. Do you agree with our approach on assessment of criteria from a scheme claiming to be MCS equivalent? If not, can you suggest an alternative assessment process?
Please provide an explanation including any supporting information with your response.

Q6.2 Do you agree with our proposals on the audit and verification of MCS equivalence by a scheme claiming equivalence?
Please provide an explanation including any supporting information with your response.

Q6.3 Are there any other aspects relating to the assessment of an alternative scheme's claim to MCS equivalence that you feel we should consider?
Please provide an explanation including any supporting information with your response.

Q6.4 Do you think that there are or should be alternative methods that equivalence to MCS could be demonstrated to Ofgem?



Consultation on MCS equivalence for the Domestic Renewable Heat Incentive Scheme

	Please provide an explanation including any supporting information with your response.
Q6.5	What ongoing evaluation of an equivalent scheme do you think is needed and how often?
Q6.6	Are there any additional points that you want to make?

7. Next Steps

Deciding on MCS equivalence proposed criteria (insight into Part 2)
Proposed plan following Part 1 (next steps and high level time plan)

High Level Time Plan

Part 2 – Consultation on proposed criteria for equivalence

- 7.1. Following this consultation Ofgem will collate all responses, assess and compare comments, assemble a list of proposed criteria for scheme equivalence and use this as the basis for a follow up consultation. We believe this will give stakeholders and interested parties an opportunity to comment on specific criteria that we propose will form the basis of equivalent scheme criteria. It's our intention to base Part 2 on a shorter, four week consultation process to review the criteria we have assembled. We may review these timescales subject to the number and complexity of responses we receive.
- 7.2. Following the conclusion of Part 1 of the consultation on 29 May 2015 the timetable below outlines the next stages and key milestones in the process. It should be noted that this timetable will be updated once we have compiled and considered responses to Part 1.

Summer 2015	Review and summarise consultation responses, compile and publish an initial report on responses.
	Develop specific proposals for criteria based on responses. Compile "formal response to consultation document" (you said, our response is).
	Publish report of initial consultation responses and conclusions.
	Prepare and issue a 4 week consultation (Part 2) based on responses and other inputs.

Part 3 – Publication of criteria for equivalence

- 7.3. Following conclusion of the Part 2 consultation, Ofgem will review all final comments received and publish these on their website.

Autumn 2015	Hold workshop(s) to discuss and agree criteria of equivalence.
	Review comments received on Part 2.
	Publish "Criteria for equivalence" report.

- 7.4. The timetable for publication will be revised and updated in due course.

Appendices

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Appendix 1 – High-Level MCS Overview

This overview is designed to give consultation readers an indication of the many and varied features of MCS but should not be considered as an exhaustive list. A thorough review of the MCS website is strongly recommended to understand the full scope of their certification, operation, governance, consumer protection and other activities.

The Microgeneration Certification Scheme (MCS), launched in 2008, is an independent, industry and stakeholder-led, internationally recognised quality assurance certification scheme. MCS itself is a BS EN ISO/IEC 17067:2013 scheme, which has ISO/IEC 17065:2012 certification bodies certifying both products and installation companies for microgeneration technologies.

MCS is designed to be a mark of quality and demonstrates compliance to industry standards and by following these standards companies demonstrate to consumers they provide installations or manufacture products consistently to the required quality every time.

MCS seeks to benefit consumers, product manufacturers and installers by building confidence through consumer protection, quality assurance, links to government incentives, simplification of planning permission and many other areas as outlined on the MCS website: <http://www.microgenerationcertification.org/about-us/why-mcs>.

MCS uses the National Calculation Methodology for the energy rating of dwellings, known as SAP, which provides a common approach to performance assessment. Information on exceptions can be found at the foot of the MCS web pages arrived at via the above link.

MCS certifies microgeneration products used to produce electricity and heat from renewable sources. MCS also certifies installation companies to ensure the microgeneration products are installed and commissioned according to the published standards listed on the MCS website, which are periodically updated to meet new and changing requirements. The MCS Standards can be accessed here:

<http://www.microgenerationcertification.org/mcs-standards/mcs-standards>

As an ISO/IEC 17067:2013 scheme, it's important to understand that MCS develops standards and scheme documents with a transparent and stakeholder-led process as required by the Conformity Assessment Bodies in the performance of their services.

MCS Standards

MCS standards were designed with input from many different stakeholders, who include product and installer representatives, consumer groups, trade associations and technical experts from across the microgeneration and renewable industry.

The MCS Technical Working Groups develop the MCS standards and scheme documents, which are predominantly based on international and European standards already in existence. Some scheme documents are developed for MCS purposes.

A key feature of the MCS standards is the focus on the outcome that a product or installation is required to meet, rather than just the methods that should be employed by installers to carry out the installation or manufacturers to test their products.

It's expected that both manufacturers and installers know and follow the relevant international and European standards for product and installation design, installation and commissioning from their skills, knowledge and competencies along with other sources. Whilst qualifications, or the Experienced Worker Route, are pre-cursors to installer certification, MCS expects installers to keep their competencies up to date along with knowledge and understanding of changes to MCS standards. The latter applies to manufacturers also.

Many members of the Technical Working Groups sit on European committees helping to develop the international and European Standards. This helps to harmonise MCS with existing ISO, IEC and EN standards, and ensure that the MCS standards and scheme documents are all kept up to date accordingly.

For reference, installer standards can be found here:

<http://www.microgenerationcertification.org/mcs-standards/installer-standards>

Also, for reference, product standards can be found here:

<http://www.microgenerationcertification.org/mcs-standards/product-standards>

A summary of all MCS standards can be found here:

<http://www.microgenerationcertification.org/images/Document%20Library%20v4.0.xls>

MCS Technologies

MCS covers electricity generating technologies with a capacity of up to 50kW, and heat generating technologies with a capacity of up to 45kW. Currently, MCS covers the following technologies:

- Biomass
- Heat pumps (air, ground and water source)
- Micro hydro turbines
- Micro Combined Heat and Power (CHP) systems
- Pitched roof mounting systems
- Solar photovoltaic
- Solar thermal
- Wind turbines

Whilst the above are the full range of technologies offered through MCS, it should be understood that only biomass, heat pumps and solar thermal products certified by MCS, and listed on Ofgem's Domestic RHI Product Eligibility List (PEL), are included in the context of this consultation. The PEL can be viewed here:

<https://www.ofgem.gov.uk/publications-and-updates/domestic-renewable-heat-incentive-product-eligibility-list-pel>.

MCS Guidance

MCS publishes on their website a number of guidance documents for consumers, installers and product manufacturers. The consumer guidance can be viewed here:

<http://www.microgenerationcertification.org/images/FINAL%20Consumer%20leaflet%20Feb%202014%20-%20MCS%20website.pdf>

This guide covers the benefits of using MCS certified products and installers as well as walking the consumer through the journey they should take when considering buying a renewable energy solution.

The five-step journey outlined clearly signposts:

1. Free and impartial advice from the Energy Saving Trust and Home Energy Scotland
2. Selecting a MCS certified installer, suggesting consumers get at least three quotes and advising also of the services offered by the Renewable Energy Consumer Code (RECC)
3. Choosing both a MCS certified installer and product
4. Ensuring deposits are no more than 25% of the total price and that they are protected by the installer
5. Highlighting the importance of the post-installation MCS Certificate, warranty certificates and other handover documentation

A useful guide for installers and product manufacturers can be viewed here:

<http://www.microgenerationcertification.org/images/FINAL%20Installer%20and%20Product%20leaflet%20March%202014%20-%20MCS%20website.pdf>

This guide covers a wide range of topics from:

- Scheme governance
- Technologies covered
- How MCS works
- 3rd party certification
- "How to get involved" through certification for:
 - product manufacturers and
 - installers through the "Qualifications" or "Experienced Worker" routes
- Certification fees

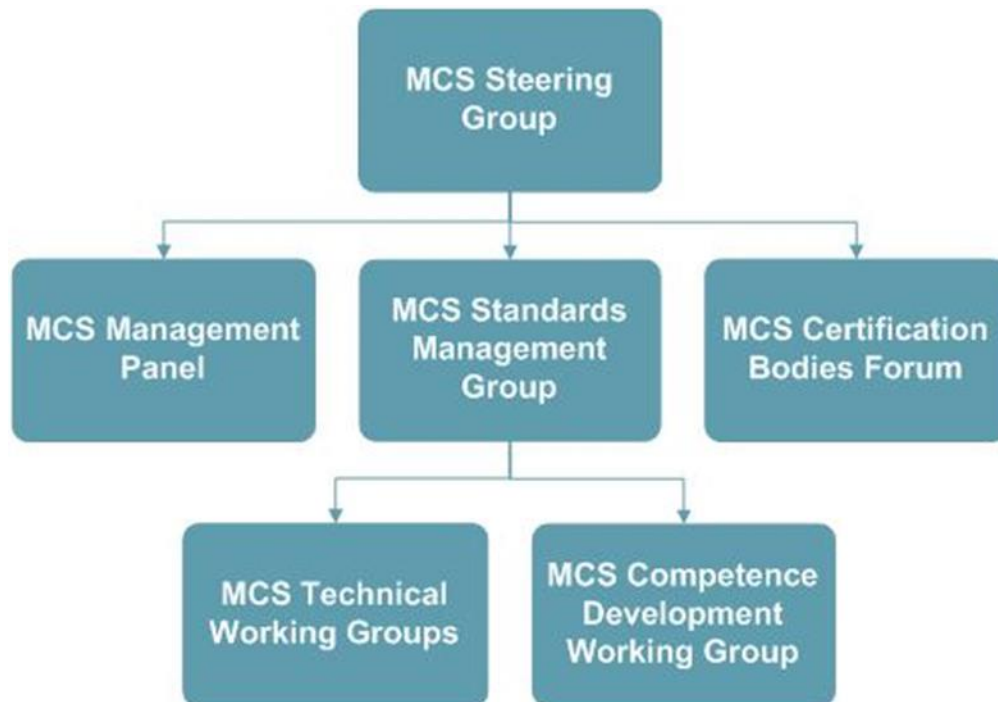
To find out more, installers and manufacturers are encouraged to visit the MCS website using the link below for more information on how to become certified.

<http://www.microgenerationcertification.org/installers-manufacturers/installers-manufacturers>

Scheme Governance

The scheme is administered by a MCS Licensee, currently Gemserv Limited, and governed by a number of MCS committees involving a large number of industry experts who volunteer their services freely to help MCS fulfil its objectives.

The simplified governance structure for MCS is as follows:



MCS Committees

MCS publishes minutes from a variety of committees and working groups and these are made publically available on their website.

MCS Steering Group

MCS Management Panel

MCS Standards Management Group

MCS Certification Bodies Forum

MCS Competencies Working Group

MCS Technical Working Groups

Appeals Procedure

An appeals procedure exists to enable appeals against a decision made by a MCS committee or the Chair of a MCS committee in relation to breaches of an MCS committee's Code of Conduct.

The Appeals Procedure for MCS Committees Code of Conduct breaches is available here:

http://www.microgenerationcertification.org/images/Appeals_Procedure_for_MCS_Comitee_CoC_Breeches_v1.0.pdf

MCS equivalence and CEN Solar Keymark

The CEN Solar Keymark scheme is considered equivalent by MCS according to their website. However, as the CEN Solar Keymark only covers the certification of Solar Thermal products and, unlike MCS, does not cover installation company certification, this statement should not be taken by readers of as indication of that which is required for MCS equivalence in the context of this consultation process.

Consumers are able to use a Solar Thermal product certified by Solar Keymark, and have been able to apply through the Government's incentive schemes (RHI and RHPP), provided the installation has been completed by an MCS certified installation company.

Solar Keymark products are listed on the Solar Keymark website and MCS maintains an up to date listing from the Solar Keymark website. Solar Keymark certified products are incorporated by MCS in the product list they provide to Ofgem on a weekly basis. These products go through the same degree of scrutiny that all other MCS certified products undergo before they are added to our Product Eligibility List and deemed eligible by Ofgem for the Domestic RHI scheme.

Appendix 2 – Domestic RHI Regulations

References to MCS and equivalence

Several references to an equivalent scheme (to MCS) are made in the Domestic RHI Regulations (2014). We are aware that the Domestic Renewable Heat Incentive Scheme (Amendment) Regulations 2015 have just come into force and have included the relevant amendments after the regulation they relate to. The areas that we would bring to your attention for review prior to submitting your responses are:

PART 1, Introductory provisions -

2. Interpretation – [*the definitions of*];

- “certified installer” means a person who is certified by the Microgeneration Certification Scheme(3) or an equivalent scheme accredited under EN 45011(4) or EN ISO/IEC 17065:2012;
- “heat emitter guide” means version 1.0 of the document “MCS 021 heat emitter guide for domestic heat pumps” published on 16 December 2013;
- “MCS register” means the register maintained by the Microgeneration Certification Scheme, or an equivalent scheme accredited under EN 45011 or EN ISO/IEC 17065:2012, of installers and plant which are certified under that scheme;

Amendments to regulation 2 (interpretation)

3.— (1) Regulation 2 is amended as follows.

- (3) For the definition of “certified installer” substitute—
““certified installer” means a person who is certified by the Microgeneration Certification Scheme (c) or a scheme which is—
 - (a) equivalent to that scheme; and
 - (b) accredited under EN 45011(a) or EN ISO/IEC 17065:2012(b);”.
- (6) For the definition of “heat emitter guide” substitute—
““heat emitter guide” means version 2.0 of the document entitled “Heat Emitter Guide for Domestic Heat Pumps” published on 21st November 2014(c);”.

PART 2, Eligibility criteria, Certification requirements -

8.— (1) The requirements referred to in regulation 3(b) are that the plant is certified under—

- (a) the Microgeneration Certification Scheme (a) as installed in accordance with the relevant installation standard in that scheme; or
- (b) a scheme accredited under EN 45011(b) or EN ISO/IEC 17065:2012(c) as installed in accordance with the installation requirements applicable to the plant which

apply under that scheme where—

- (i) that scheme is equivalent to the Microgeneration Certification Scheme; and
 - (ii) the requirements are those which apply on the plant's first commissioning date and which are equivalent to the relevant installation standard.
- (2) In paragraph (1), “relevant installation standard” means, if the first commissioning date for the plant is—
- (a) on or after the relevant date—
 - (i) where the plant is a biomass plant, version 4.0 of the document entitled “Microgeneration Installation Standard: MIS 3004 requirements for contractors undertaking the supply, design, installation, set to work, commissioning and handover of solid biofuel heating systems” published on 16th December 2013(d);
 - (ii) where the plant is a heat pump, version 4.0 of the document entitled “Microgeneration Installation Standard: MIS 3005 requirements for contractors undertaking the supply, design, installation, set to work, commissioning and handover of microgeneration heat pump systems” published on 16th December 2013(e); or
 - (iii) where the plant is a solar thermal plant, version 4.0 of the document entitled “Microgeneration Installation Standard: MIS 3001 requirements for contractors undertaking the supply, design, installation, set to work, commissioning and handover of solar heating microgeneration systems” published on 16th December 2013(f); or
 - (b) earlier than the relevant date, any installation requirements applicable to the plant under the Microgeneration Certification Scheme on the first commissioning date.

Amendments to regulation 8 (certification requirements)

8.— (1) Regulation 8 is amended as follows.

- (2) In paragraph (1)(a) and (b)(ii) for “the relevant installation standard” substitute “a relevant installation standard”.
- (3) For paragraphs (ii) and (iii) of paragraph (2)(a) substitute—
 - “(ii) where the plant is a ground source heat pump or air source heat pump—
 - (aa) version 4.1 of the document entitled “Microgeneration Installation Standard: MIS 3005 requirements for contractors undertaking the supply, design, installation, set to work, commissioning and handover of microgeneration heat pump systems” published on 21st November 2014(a); or
 - (bb) version 4.0 of the document entitled “Microgeneration Installation Standard: MIS 3005 requirements for contractors undertaking the supply, design, installation, set to work, commissioning and handover of microgeneration heat pump systems” published on 16th December 2013(b),

provided it is in force on the plant's first commissioning date; or

(iii) where the plant is a solar thermal plant—

- (aa) version 4.1 of the document entitled “Microgeneration Installation Standard: MIS 3001 requirements for contractors undertaking the supply, design, installation, set to work, commissioning and handover of solar heating microgeneration systems” published on 21st November 2014(c); or
- (bb) version 4.0 of the document entitled “Microgeneration Installation Standard: MIS 3001 requirements for contractors undertaking the supply, design, installation, set to work, commissioning and handover of solar heating microgeneration systems” published on 16th December 2013(d),

provided it is in force on the plant's first commissioning date; or”.

PART 5, RHI payments, Calculation of [*solar thermal*] deemed annual heat generation

- 29.**— (1) The amount of heat in kWh which an accredited domestic plant is deemed to generate every 12 months (the “deemed annual heat generation”) is calculated in accordance with this regulation.
- (6) If the accredited domestic plant is a solar thermal plant and its first commissioning date is on or after the relevant date, its deemed annual heat generation is the total heat generated by that plant on an annual basis calculated in accordance with version 1.1 of the document entitled “Microgeneration Installation Standard: MCS 024 Solar Domestic Hot Water Energy Calculation” published on 16th December 2013(a).
- (7) If the accredited domestic plant is a solar thermal plant and its first commissioning date is earlier than the relevant date, the deemed annual heat generation is the total heat which the Authority estimates, at the time it gives accreditation, that the accredited domestic plant will generate on an annual basis, having regard to any relevant information about the accredited domestic plant on the MCS register.

PART 9, Metering and monitoring agreements, Additional payments where a registered metering and monitoring agreement relates to an accredited domestic plant

- 50** (3) In order to determine whether to give registration, the Authority may—
- (a) arrange for a site inspection to be carried out; and
 - (b) verify any information provided by the applicant against any other information available to it, including any information provided by the metering and monitoring installer or available to it on the MCS register.

PART 12, Additional powers and functions of the Authority, Reliance on declarations and other information available to the Authority –

66. When exercising any functions under these Regulations, the Authority may—

- (a) treat any declarations provided to it by an applicant in support of any application under these Regulations, or by a participant, as conclusive as to the matters to which they relate, unless the Authority has reason to believe that any such declaration is not accurate;
- (b) verify any information provided by an applicant or participant against any information on the MCS register and any other information available to the Authority;
- (c) treat inclusion of a plant on the MCS register as evidence that the plant has been certified on the basis that the plant is installed in accordance with a relevant installation standard or a standard which is equivalent to a relevant installation standard; and
- (d) treat any information about a plant on the MCS register as conclusive as to the matters to which it relates.

SCHEDULE 4, Information required for accreditation, PART 1, Information required from all applicants making an accreditation application -

1. The information referred to in regulation 17(2)(a) is—

- (h) the unique reference number or numbers under which the plant for which accreditation is sought is registered on the MCS register;

Appendix 3 – Consultation Response and Questions

Ofgem would like to hear the views of interested parties in relation to any of the issues set out in this document.

We would especially welcome responses to the specific questions set out at the end of each chapter and which are replicated below.

Responses should be received by 29/05/2015 and should be sent to:

Domestic RHI Consultation
Ofgem
9 Millbank,
London,
SW1P 3GE

DRHIconsultation@ofgem.gov.uk

Unless marked confidential, all responses will be published by placing them in Ofgem's library and on its website www.ofgem.gov.uk. Respondents may request that their response is kept confidential. Ofgem will respect this request, subject to any obligations to disclose information, for example, under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004.

Respondents who wish to have their responses remain confidential should clearly mark the document/s to that effect and include the reasons for confidentiality. It would be helpful if responses could be submitted both electronically and in writing. Respondents are asked to put any confidential material in the appendices to their responses.

Next steps – having considered the responses to this consultation, in summer 2015 we plan to publish an interim report that will take into account responses to this consultation. Following this, in autumn 2015, we will publish Part 2 of the consultation based on responses to Part 1, along with other inputs, seeking final views on the criteria proposed and assessment proposals.

Chapter Three - Consultation Questions

Q3.1. Do you have any comments relating to the consultation process we have selected?
Please provide an explanation, including any supporting information, with your response.

Q3.2 Do you have any comments on the timescales outlined?

Chapter Four - Consultation Questions

Q4.1. Do you agree with these principles?
Please provide an explanation including any supporting information with your response.

Q4.2 Do you have any comments on the principles outlined in this section, such as suggestions to make them more appropriate?

Q4.3 Are there any areas not mentioned that you feel should be covered?
Please provide an explanation including any supporting information with your response.

Chapter Five - Consultation Questions

Q5.1. Do you agree with our proposals on MCS equivalence criteria?
Please provide an explanation including any supporting information with your response.

Q5.2 What additional criteria, if any, do you suggest should be considered?
Please provide an explanation including any supporting information with your response.

Chapter Six - Consultation Questions

Q6.1.	<p>Do you agree with our approach on assessment of criteria from a scheme claiming to be MCS equivalent? If not, can you suggest an alternative assessment process?</p> <p>Please provide an explanation including any supporting information with your response.</p>
Q6.2	<p>Do you agree with our proposals on the audit and verification of MCS equivalence by a scheme claiming equivalence?</p> <p>Please provide an explanation including any supporting information with your response.</p>
Q6.3	<p>Are there any other aspects relating to the assessment of an alternative scheme's claim to MCS equivalence that you feel we should consider?</p> <p>Please provide an explanation including any supporting information with your response.</p>
Q6.4	<p>Do you think that there are or should be alternative methods that equivalence to MCS could be demonstrated to Ofgem?</p> <p>Please provide an explanation including any supporting information with your response.</p>
Q6.5	<p>What ongoing evaluation of an equivalent scheme do you think is needed and how often?</p>
Q6.6	<p>Are there any additional points that you want to make?</p>

Appendix 4 – Feedback Questionnaire

Ofgem considers that consultation is at the heart of good policy development. We're keen to consider any comments or complaints about the manner in which this consultation has been conducted. In any case we would be keen to get your answers to the following questions:

1. Do you have any comments about the overall process, which was adopted for this consultation?
2. Do you have any comments about the overall tone and content of the consultation?
3. Was the report easy to read and understand, could it have been better written?
4. To what extent did the report's conclusions provide a balanced view?
5. To what extent did the report make reasoned recommendations for improvement?
6. Please add any further comments?

Please send your comments to:

Andrew MacFaul
Consultation Co-ordinator
Ofgem
9 Millbank
London
SW1P 3GE

andrew.macfaul@ofgem.gov.uk